

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TELENOR EAST INVEST AS,

Plaintiff,

-against-

ALTIMO HOLDINGS & INVESTMENTS
LIMITED, ECO TELECOM LIMITED, CTF
HOLDINGS LIMITED, CROWN FINANCE
FOUNDATION, and RIGHTMARCH LIMITED,

Defendants.

07 Civ. 4829 (DC)
ECF ACTION

DECLARATION OF RONALD S. ROLFE

I, Ronald S. Rolfe, declare as follows:

1. I am a member of the firm of Cravath, Swaine & Moore LLP, counsel for Defendants Altimo Holdings & Investments Limited (“Altimo”), Crown Finance Foundation (“Crown”) and Rightmarch Limited (“Rightmarch”). I am admitted to practice law in the State of New York and this Court. I submit this declaration in support of Defendants’ Opposition to Telenor’s Motion to Compel Discovery in the above-titled action.

2. I am familiar with the facts set forth in this declaration, either from personal knowledge or on the basis of public documents.

3. Attached hereto as Exhibit A is a true and complete copy of the cover letter, dated June 7, 2007, attaching the Complaint and Summons for this action.

4. Attached hereto as Exhibit B is a true and complete copy of a letter, dated September 11, 2008, from Robert L. Sills to the Court requesting an extension of the discovery deadline, with an endorsement from the Court and an accompanying Order, dated September 17, 2009, setting a “final” deadline of February 27, 2009 for the completion of all fact and expert discovery.

5. Attached hereto as Exhibit C is a true and complete copy of a letter from me to Robert L. Sills, dated October 21, 2008.

6. Attached hereto as exhibit D is a true and complete copy of a letter from Robert L. Sills to me, dated October 31, 2008.

7. Attached hereto as Exhibit E is a true and complete copy of a letter from Robert L. Sills to the Court, dated November 14, 2008.

8. Attached hereto as Exhibit F is a true and complete copy of a letter from me to the Court, dated November 17, 2008.

9. Attached hereto as Exhibit G is a true and complete copy of a letter from Ayanna Lewis-Gruss to Tara Tune, dated December 24, 2008.

10. Attached hereto as Exhibit H is a true and complete copy of a letter from Ayanna Lewis-Gruss to Lisa J. Fried, dated January 16, 2009.

11. Attached hereto as Exhibit I is a true and complete copy of a letter from Robert L. Sills to me, dated February 24, 2009.

12. Attached hereto as Exhibit J is a true and complete copy of a letter from me to Robert L. Sills, dated March 2, 2009.

13. Attached hereto as Exhibit K is a true and complete copy of a letter from me to Robert L. Sills, dated May 4, 2009.

14. Attached hereto as Exhibit L is a true and complete copy of a letter from Lisa J. Fried to Robert L. Sills, dated May 6, 2009.

15. Attached hereto as Exhibit M is a true and complete copy of a letter from Ayanna Lewis-Gruss to Lisa J. Fried, dated May 14, 2009.

16. Attached hereto as Exhibit N is a true and complete copy of Defendants' Policy On Use of Internet Resources Provided to CIS (Corporate Information Systems) Users.

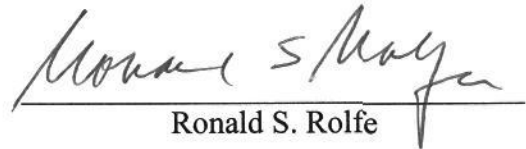
17. Attached hereto as Exhibit O is a true and complete copy of the Report of the Civil Rules Advisory Committee issued by the Committee on Rules of Practice and Procedure of the Judicial Conference of the United States, dated May 27, 2005 and revised July 25, 2005.

18. Attached hereto as Exhibit P is a true and complete copy of The Sedona Principles, Second Edition: Best Practices, Recommendations & Principles for Addressing Electronic Document Production (The Sedona Conference® Working Group Series, 2007).

19. Attached hereto as Exhibit Q is a true and complete copy of The Sedona Conference Journal®, Volume 8, Fall 2007.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 21, 2009


Ronald S. Rolfe